

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
V.	§	NO. 4:22CR151
	§	(Judge Mazzant)
AMBER MICHELLE BROWN		

**MOTION FOR CONTINUANCE OF PRETRIAL MOTION DATES,  
CHANGE OF PLEA DEADLINE, AND FINAL PRETRIAL CONFERENCE DATE**

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF TEXAS;

COMES NOW, Defendant AMBER BROWN, by and through her undersigned attorney,  
and files this, her MOTION FOR CONTINUANCE OF PRETRIAL MOTION DATES,  
CHANGE OF PLEA DEADLINE, AND FINAL PRETRIAL CONFERENCE DATE, and would  
show this Honorable Court as follows, to-wit:

I.

**PROCEDURAL HISTORY**

On the 15<sup>th</sup> day of June 2022, the Defendant, Amber Brown was indicted in a one-count indictment alleging a violation of 18 U.S.C. § 1341 (Mail Fraud). On or about June 22, 2022, Defendant appeared before United States Magistrate Judge Christine Nowak for an Initial Appearance and Arraignment on the instant indictment. The Office of the Federal Public Defender for the Eastern District of Texas was appointed to represent the Defendant on January 20, 2023. The Pretrial Order relating to Pretrial Discovery and Inspection was filed, and the order imposed

a deadline of March 15, 2024, for a change of plea by the Defendant and scheduled a Final Pretrial Conference for April 5, 2024.

II.

**GROUND FOR MOTION**

Defense counsel is currently in the process of receiving and reviewing discovery. Because of the nature of the offense and the possible punishment, defense counsel must then carefully review the evidence with the Defendant and insure that all questions are answered. In addition, there are issues that defense counsel wishes to discuss with the government and present to the Defendant. Defendant respectfully requests additional time to discuss the case with counsel for the government and insure that all evidence is reviewed in order to make a fully informed decision. This request is made in order to insure that effective assistance of counsel is provided to the Defendant.

Due to the reason outlined above, Defendant respectfully requests an additional 60 days for the pretrial motion dates, change of plea deadline, and final pretrial conference date.

WHEREFORE PREMISES CONSIDERED, Defendant respectfully requests that the pretrial motion dates, change of plea deadline, and final pretrial conference date in this case be reset from their current setting.

Respectfully submitted,

/s/ Douglas Schopmeyer  
DOUGLAS SCHOPMEYER  
Assistant Federal Defender  
Eastern District of Texas  
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Sherman, Texas 75090  
(903) 892-4448  
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*Attorney for Defendant*

#### **CERTIFICATE OF CONFERENCE**

Defense counsel contacted Assistant United States Attorney, **Sean Taylor**, and the Government does not oppose this motion.

#### **CERTIFICATE OF SERVICE**

I hereby certify that on the 14th day of March, a true and correct copy of the foregoing Defendant's MOTION FOR CONTINUANCE OF PRETRIAL MOTION DATES, CHANGE OF PLEA DEADLINE, AND FINAL PRETRIAL CONFERENCE DATE was sent by CM/ECF to:

Sean Taylor  
Assistant U.S. Attorney  
600 E. Taylor, Suite 2000  
Sherman, Texas 75090

/s/ Douglas Schopmeyer  
Attorney for Defendant